



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

OFFICE OF
PESTICIDE PROGRAMS

February 18, 2021

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Representative for Ragan and Massey

**Re: Petition to Cancel Ragan and Massey's Registration for
Glufosinate-Ammonium Technical**

Dear Ms. Schoomaker and Mr. Massey:

The United States Environmental Protection Agency ("EPA" or "the Agency") received the Agricultural Handler Exposure Task Force, LLC's ("AHETF") petition to cancel Ragan and Massey's ("RM") registration and to deny any applications for glufosinate-ammonium on February 10, 2021. This is all the communications EPA has regarding the petition.

I am responsible for maintaining the record for this petition and coordinating the analysis of the issues it presents. To support a fair process, facilitate administrative regularity and convenience, and ensure that the Agency's decision is supported by the record, please adhere to the following guidelines for communicating with the Agency on the petition until a final decision is issued:

- (1) No party or representative of a party should engage in substantive communications specific to the petition with any EPA employee other than me. However, in rare circumstances, I may invite the parties to communicate certain information specific to the petition to other EPA employees. If any party inadvertently discusses the petition with another EPA

employee, the party should immediately provide me and the other parties a memorandum summarizing the communication.

- (2) Any substantive communication specific to the petition with me or any other EPA employee should include all parties. Digital communications should be simultaneously provided to the other parties. Written communications should be simultaneously provided on the other parties and should include a statement indicating that the other parties have been served. Oral communications should be made only when all parties are present and should be followed by a joint memorandum by the parties summarizing the communication.
- (3) Communications and documents specific to this petition should be transmitted by email whenever possible.
- (4) The parties should avoid submitting Confidential Business Information (CBI) where possible, particularly by email. If either party believes it needs to submit CBI materials, please send an email to me and the other parties so we can discuss how to safely submit CBI. That party should additionally provide me and the other parties a copy of the intended submission with all CBI removed. If any party discovers that one of their prior submissions unintentionally included unmarked CBI, please immediately provide me and the other parties an updated copy of that submission with all CBI removed. Any submissions on this petition that are not marked as containing CBI will be publicly available upon request.

Beyond the petition and response, any additional briefing will be at the Agency's discretion. If either party wishes to submit any additional briefing, please inform me and the other parties so EPA can establish a briefing schedule.

If you have any questions, please email them to me at sleasman.katherine@epa.gov.

Sincerely,

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cc: Stephanie Schwarz, PTSLO

cc: Erik Kraft, Manjula Unnikrishnan, and Rachel Holloman, OPP